



January 12, 2024

Via ECF

Honorable Kenneth M. Karas,
United States District Court
300 Quarropas Street
White Plains, NY 10601

Re: United States v. Sampson
22-cr-640 (KMK)

Dear Judge Karas:

I represent Mr. Davon Waddell in the above-captioned matter, and I am writing to request that the Court permit the appointment of Michael Perkins, Esq. as associate CJA counsel for Mr. Waddell at an hourly rate of \$110, with approval of 150 hours. Mr. Perkins is an associate attorney at my firm who has previously assisted me in many of my cases in the Southern District of New York, Eastern District of New York, Northern District of New York and the District of New Jersey.

Mr. Waddell is named in a 28-defendant, 34-count superseding indictment. Specifically, Mr. Waddell is alleged to have participated in a Racketeering Conspiracy which spanned multiple years, in addition to multiple counts of Attempted Murder in Aid of Racketeering, Discharge of a Firearm in Connection with a Crime of Violence and Drug Trafficking, and Hobbs Act Robbery.

The discovery provided to date is exceptionally voluminous and even with the most diligent of efforts, I would be unable to effectively review it in its entirety. Mr. Perkins' appointment would have the benefit of both aiding Mr. Waddell's defense by allowing for a more expeditious and comprehensive review of the provided discovery, as well as the conservation of CJA funds and resources by virtue of Mr. Perkins' reduced billing rate.

Thank you for your consideration in this matter and I am happy to provide more information upon the Court's request.

Granted.

Respectfully Submitted,

s/ Elena Fast

Elena Fast, Esq.

Counsel for Davon Waddell

So Ordered
1/12/24

cc: All counsel (by ECF)